IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

EATON CORPORATION) CASE NUMBER: 1:20-cv-00893-DCN
Plaintiff))) JUDGE DONALD C. NUGENT
v.) JODGE DONALD C. NUGENT
ANGSTROM AUTOMOTIVE GROUP, LLC, et al.)))
Defendants.))

<u>DEFENDANTS' UNOPPOSED MOTION FOR ADDITIONAL TIME TO WHICH TO</u> RESPOND TO THE COMPLAINT

Defendants Angstrom Automotive Group, LLC and Wrena, LLC, pursuant to Rule 12 of the Federal Rules of Civil Procedure, respectfully move the Court for an additional twenty-eight days (28) until and including June 24, 2020 in which to answer or otherwise respond to the Complaint. This action was commenced on April 24, 2020 and Defendants were served on or about May 4, 2020. Ohio counsel has just been retained and requires additional time in which to prepare the proper responsive pleadings. Counsel for Plaintiff has been consulted and has no objection to and consents to the requested extension of time. This is the first such requested extension and is not interposed for the purpose of delay.

Respectfully submitted,

/s/ Lawrence D. Pollack

Steven S. Kaufman (0016662) Lawrence D. Pollack (0042477) ULMER & BERNE LLP 1660 West 2nd Street, Suite 1100 Cleveland, OH 44113

Tel: (216) 583-7000 Fax: (216) 583-7001 skaufman@ulmer.com lpollack@ulmer.com

Counsel for Defendants Angstrom Automotive Group, LLC and Wrena, LLC **CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2020, the foregoing Defendants' Unopposed Motion for

Additional Time to Which to Respond to the Complaint was filed electronically. Notice of this

filing will be sent to all parties registered to receive electronic notices through the Court's CM/ECF

system. Parties may access this filing through the Court's PACER system.

/s/ Lawrence D. Pollack

One of the Attorneys for Defendants Angstrom Automotive Group, LLC and Wrena, LLC

2639462